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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

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Revision of the Commission's
Rules to Ensure Compatibility
with Enhanced 911 Emergency
Calling Systems

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CC Docket No. 94-102

AT&T Wireless Request
for Limited Modification of E911
Phase II Waiver

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COMMENTS OF NENA, APCO AND NASNA

The National Emergency Number Association ("NENA"), the Association of Public-Safety Communications Officials-International, Inc. ("APCO") and the National Association of State Nine One One Administrators ("NASNA") (collectively, "Public Safety Organizations") hereby comment on the captioned request.¹

AT&T had proposed to install a GSM overlay to its TDMA markets on its own schedule, but to offer E-OTD handsets simultaneously in the converted markets. Thus, customers were to have immediate access to E-OTD location capabilities estimated at 100 meters (67% of the time) and 300 meters (95%) initially but improving to 50 and 150 meters, respectively, after two years. (Order, ¶¶28-29) According to AT&T's modification request, however, the related network equipment and handset delivery schedules essential to E-OTD have lagged behind the GSM rollout. Seattle, Portland, Las Vegas, Phoenix and other areas now are receiving GSM service

¹ Dated February 1, 2002. The modification request deals only with the GSM aspects of AT&T's original waiver granted in Order, FCC 01-294, released October 12, 2001. Plans for locating callers using the carrier's TDMA systems are under discussion in the Enforcement Bureau. Order, ¶11.

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but without location-capable phones. (Request, 2-3, n.3) The carrier currently “anticipates that E-OTD will be implemented by December 31, 2002 in all areas where it has received valid PSAP requests as of June 30, 2002.” *Id.*

Given the gap of nearly a year before GSM customers can purchase and use E-OTD handsets, AT&T proposes to deploy an interim, network-based location technology, NSS, which in an earlier waiver grant to VoiceStream, was described as capable of locating 9-1-1 wireless callers only within 500 to 1000 meters.² Taking stock of caller location choices for GSM systems in the year between the VoiceStream and AT&T waiver grants, the Commission found that E-OTD remained “the best currently available solution” and noted that – since E-OTD was to be installed simultaneously with GSM – “it is unclear what benefit would be achieved” from requiring AT&T to consider network-based alternatives for GSM which were claimed by vendors such as Grayson Wireless. (Order, ¶15, n.36)

AT&T should be ordered to test
alternatives to NSS.

We are not capable of evaluating whether AT&T’s modification proposals – to install E-OTD by the end of the year in all areas with PSAP requests as of 6/30/02, and to implement NSS in the balance of the areas, without regard to PSAP request – are aggressive enough in light of the delays it blames on network equipment and handset suppliers. We continue to look to the Hatfield inquiry generically, and the Enforcement Bureau particularly, to sort out the conflicting claims by which carriers and vendors each attempt to shift to the other the responsibility for delay.³

² Fourth Memorandum Opinion and Order, 15 FCC Rcd 17442 (2000), ¶¶55-61.

³ FCC news release, November 20, 2001.

We submit, however, that NSS is a poor interim choice for network-based location and urge that AT&T at least be ordered to test the GSM solution claimed by Grayson or any other alternative that promises to out-perform NSS.⁴ While we remain steadfastly technology- and vendor-neutral on the selection of location-determining products, we note an existing contractual agreement between AT&T and Grayson to provide a location solution for 2000 TDMA cell sites by the end of the year.⁵

Integrate the GSM and TDMA
aspects of AT&T's waiver.

The pendency of both the GSM waiver modification and the TDMA discussions at the Enforcement Bureau present the FCC with the opportunity to reassemble the two pieces of the AT&T waiver into a single, more manageable set of requirements. We ask that the Commission take into account the Enforcement Bureau outcome before it agrees to the requested GSM modification.

Conclusion

For the reasons discussed, the FCC should order the testing of alternatives to NSS as an interim location solution pending the full outfitting of GSM systems with E-OTD capability.

Any TDMA requirements emerging from the Enforcement Bureau discussions should be

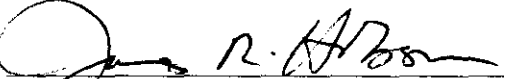
⁴ The Public Safety Organizations have been steadfast in their opposition to AT&T's first choice of a network solution, MNLS, which appeared to resemble NSS in its lack of discrimination. *See*, Letter of Douglas Brandon to Thomas Sugrue of the FCC, September 17, 2001. Although some public safety representatives accepted VoiceStream's NSS proposal at the time (September 2000), the acceptance was not universal and the 18 months since have brought forth new possibilities.

⁵ Letter of Lori Buerger to Norm Forshee, January 17, 2002, Attachment I hereto. *See also*, Brandon letter to Sugrue, note 4 above.

incorporated into a single set of fair but firm benchmarks on AT&T's path to compliance with the Phase II rules.

Respectfully submitted,

NENA, APCO AND NASNA

By 

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March 4, 2002

Certificate of Service

The foregoing "Comments of NENA, APCO and NASNA" have been mailed today to

Douglas I. Brandon
Vice President-External Affairs
AT&T Wireless Services Inc.
1150 Connecticut Avenue N.W., Suite 400
Washington, D.C. 20036

March 4, 2002


Barbara A. Lutes



AT&T Wireless Services
15 East Midland Avenue
Paramus, NJ 07652

January 17, 2002

Norm Forshee
9-1-1 Coordinator
St. Clair County ETSB
101 South 1st Street
Belleville, IL 62220-2114

Dear Norm:

I'm writing today to share the news of AT&T Wireless' (AWS) execution of a contract with Grayson Wireless. AWS plans to utilize Grayson's Geometrix (TDOA/AOA) system to comply with the Federal Communication Commission's Phase II E911 regulations. For your information, I have attached a copy of Grayson's January 16, 2002 release regarding the contract.

As you know, AWS is continuing to await the FCC's finalization of a Consent Decree outlining the deployment of Phase II E911 systems on TDMA networks. You'll be hearing more from us regarding deployment plans once that Decree is completed. We look forward to talking with you then and working together toward Phase II deployment in your area.

In addition, we received your correspondence dated November 8, 2001, inquiring about the status of our Phase II efforts. Please note that the statement in that letter regarding AWS failure to respond in writing is inaccurate. AWS responded to and acknowledged receipt of your Phase II request in a letter, from AWS to your attention, dated January 2, 2001. A copy of that letter is attached for your files. As St. Clair County is one of the earliest Phase II requests received by AWS, we will be talking with you soon (as noted above) regarding deployment plans for your jurisdiction.

If you have questions or concerns in the meantime, please don't hesitate to contact me at 312-258-2906. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Lori Buerger by clo".

Lori Buerger
Director - External Affairs





NEWS RELEASE

FOR IMMEDIATE RELEASE

**ALLEN TELECOM'S GRAYSON WIRELESS DIVISION TO SUPPLY
911 CALLER LOCATION SYSTEMS TO AT&T WIRELESS**

BEACHWOOD, OHIO January 16, 2002 – Allen Telecom's (ALN: NYSE) Grayson Wireless Division today announced that AT&T Wireless (AWE: NYSE) has signed an agreement to purchase Grayson's Geometrix® wireless 911 caller location systems for installation in selected AT&T Wireless markets.

The network-based Geometrix systems are compatible with AT&T Wireless' TDMA (digital) and AMPS (analog) network technologies and existing customer handsets. AT&T Wireless will install the Geometrix systems to comply with the Federal Communication Commission's Phase II E911 regulations. The system automatically locates and forwards the caller position information to public safety agencies that receive 911 calls.

Terry Garner, President of Grayson Wireless, stated, "We are delighted to have been selected by AT&T Wireless. We look forward to working with AT&T Wireless and providing them with our Geometrix systems to locate customers in emergency situations. We are prepared to fully support AT&T Wireless as it brings this enhanced security feature to its customers."

Geometrix location systems allows AT&T Wireless to provide locations of wireless 911 callers to selected emergency response centers that are equipped to receive such information. AT&T Wireless customers will be able to use their existing handsets and current 911 calling procedures. To maintain caller privacy, Geometrix systems are designed to provide location information only when a caller initiates a 911 call.

"We chose Grayson Wireless after extensively researching and testing location technologies from a variety of vendors," said Greg Slemons, executive vice president – network services for AT&T Wireless. "The safety of our customers is paramount to AT&T Wireless and we believe that through our partnership with Allen Telecom we will successfully deliver innovative, secure and highly reliable E911 technology to our subscribers while working to comply with FCC regulations."

Grayson Wireless (www.geometrix911.com), a division of Allen Telecom Inc., (NYSE: ALN) designs, builds, and markets the Geometrix system, a state-of-the-art, scalable, cost-effective, network overlay solution intended to allow carriers to meet the FCC's stringent Phase II requirements for wireless E911 caller location. Geometrix is the first Phase II-compliant wireless location system to be placed into commercial service, and to date remains the only Phase II-compliant system in service. Geometrix works with the CDMA, GSM, TDMA, AMPS, and iDEN wireless technologies, and is thus compatible with all wireless phones in use in the United States. In addition to meeting FCC E 911 requirements, Geometrix can also provide caller-locating support for a wide variety of location-based value-added services.

Allen Telecom Inc. (<http://www.allentele.com>) is a leading supplier of wireless equipment to the global telecommunications infrastructure market. FOREM supplies sophisticated filters, duplexers, combiners, amplifiers and microwave radios to an array of OEM customers. MIKOM focuses on providing repeaters, in-building systems and other products that enhance both the coverage and the capacity of a wireless system. Tekmar Sistemi provides integrated low power fiber optic and cable distributed antenna systems for indoor coverage systems. Decibel Products and Antenna Specialists manufacture land based and mobile antennas in frequency bands that cover all of the traditional wireless networks. Grayson Wireless supplies measurement and signal processing systems for testing the performance of a wireless network, network-based wireless caller geolocation systems for E 911 and value added services. Comsearch offers program management, network planning, engineering, development and installation of wireless networks worldwide.

AT&T Wireless (NYSE: AWE) is the largest independently traded wireless carrier in the United States, following its split from AT&T on July 9, 2001. AT&T Wireless operates one of the largest digital wireless networks in North America. With more than 17.1 million subscribers, and full-year 2000 revenues exceeding \$10.4 billion, AT&T Wireless is committed to being among the first to deliver the next generation of wireless products and services. Today, AT&T Wireless offers customers high-quality wireless voice and data communications services in the U.S. and internationally. AT&T Wireless Customer Advantage is the company's commitment to ensure that customers have the right equipment, the right calling plan, and the right customer services options - today and tomorrow. For more information, please visit us at www.attwireless.com.

Statements included in this press release, which are not historical in nature, are forward-looking statements made pursuant to the safe harbor provisions of the Private Securities Litigation Reform Act of 1995. Forward-looking statements regarding the Company's future performance and financial results are subject to a number of risks and uncertainties that could cause actual results to differ materially from those set forth in the forward-looking statements. Factors that could cause the Company's actual results to materially differ from forward-looking statements made by the Company, include, among others, the cost, success and timetable for new product development, including specifically products for 3G, E 911 and power amplification, the health and economic stability of the world and national markets, the cost and availability of capital and

financing to the wireless carriers, the uncertain timing and level of purchases of both current products and those under development for current and prospective customers of the Company's products and services, the effective realization of inventory and other working capital assets to cash, the collectibility of receivables, the impact of competitive products and pricing in the Company's markets, the future utilization of the Company's tax loss carry forwards and the impact of U.S. and foreign government legislative/regulatory actions, including, for example, the scope and timing of E 911 geolocation requirements in the U.S. markets and spectrum availability and licensing for new wireless applications. Allen Telecom Inc.'s Annual Report on Form 10-K and Quarterly Reports on Form 10-Q contain additional details concerning these factors.

For further information contact:

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